

1 [Counsel Listed on Signature Page]
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ORDER ADOPTING

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB
**JOINT STIPULATION REGARDING
VALIDATION SAMPLE TESTING**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

ALL ACTIONS

JOINT STIPULATION

Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation regarding the next Validation Sample.

I. Test Sample 3 Validation

The parties originally submitted a timeline for TAR Data Sharing consisting of three separate Test Samples spanning from December 23, 2024 through April 30, 2025. Dkt. No. 2009-1. The parties have since worked through the first two Test Samples, and the Court has ruled on the relevant disputes. Since the Court's ruling on document responsiveness, the parties have reevaluated the timeline to begin Test Sample 3. Therefore:

1. The parties agree to the new timeline for Test Sample 3 as laid out in Exhibit A.
 2. Test Sample 3 will now begin on April 7, 2024 with any dispute filed with the Court by May 19, 2025.

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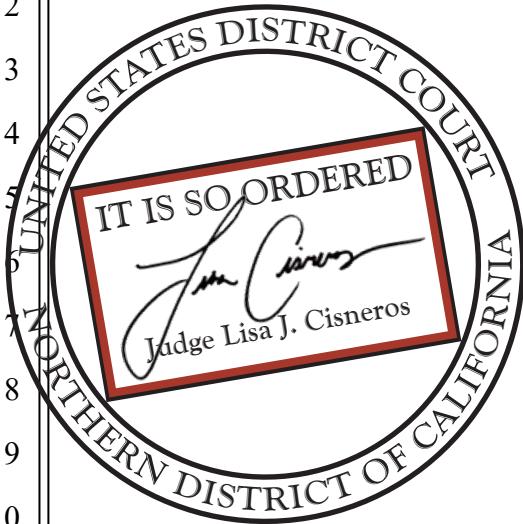
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Dated: April 7, 2025

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: April 2, 2025

By: /s/ Roopal P. Luhana

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Roopal P. Luhana

Exhibit A: Timeline for TAR Data Sharing

| Task | Test Sample 3 (T1-T4) 4500 documents |
|---|--|
| Plaintiffs will provide LH with a list of Plaintiffs' representatives to access the Relativity and virtual desktop environments | 4/7/2025 |
| LH draws sample in strata of Dkt-524 Section 8.a.4. & identify potential Personal Identifying Information (PII) and privilege to Defendants. LH to begin production of validation sample documents that do not have potential Personal Identifying Information and Privilege Concerns Defendants review of test sample (prioritizing potential Personal Identifying Information and Privilege concerns) | 4/10/2025 |
| Defendants release the sample set production (assuming timely receipt of users) excluding potential PII and privilege. | 4/15/2025 4,500 documents (sample set reflects parties' agreed-upon remedial measures to date) |
| Defendants provide steps taken to adjust model in light of the 11-20-2024 sample set 1 results | N/A |
| Defendants provide remaining non-privileged/PII documents to LH | 4/18/2025 |
| Remaining documents to be made available to Plaintiffs' workspace | 4/21/2025 |
| Plaintiffs complete review of documents in Test Sample | 4/28/2025 |
| Defendants provide validation statistics for sample set | 4/28/2025 |

Timeline for TAR Data Sharing

| Task | Test Sample 3 (T1-T4) 4500 documents |
|--|---|
| Parties exchange coding logs at 5 PM PT | 4/28/2025 |
| LH begins implementation of learning from coding logs | 4/28/2025 |
| Parties reach agreement as to the form of the dispute log | 4/19/2025 |
| Parties exchange final dispute log at 5 pm PT and provide copies to LH for additional learning | 5/5/2025 |
| Final meet and confer on remaining disputed relevancy designations in Classification Dispute Log. | 5/12/2025 |
| PTO 8 draft position by moving party by 5 PM PT | 5/14/2025 |
| PTO 8 draft position by responding party by 5 PM PT | 5/16/2025 |
| PTO 8 dispute (if any) filed by 5 PM PT | 5/19/2025 |
| By this date (or within 3 days after ruling on PTO 8 dispute) parties to agree on remedial measures for additional learning, incorporating agreements and rulings from the Court (if any). | 5/29/2025 |
| Date to remove Plaintiffs' access to prior sample sets to prepare for next sample | N/A |
| Defendants to apply agreed alignment efforts (or 7 days after the Court provides direction following PTO 8) | 6/6/2025 |
| Defendants make final production of additional documents from the | 6/16/2025 |

Timeline for TAR Data Sharing

| Task | Test Sample 3 (T1-T4) 4500 documents |
|--|---|
| learning process (or within 14 days of applying alignment efforts) | |